

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
AT CINCINNATI

ALYSSA PORTNOY & DARLENE  
PORTNOY,

Plaintiffs,

v.

NATIONAL CREDIT SYSTEMS, INC.,  
ET AL.,

Defendants.

Case No.: 1:17-cv-00834-MRB  
Hon. Judge Michael R. Barrett

**NATIONAL CREDIT SYSTEMS, INC.'S RESPONSES TO  
PLAINTIFF'S REQUESTS TO PRODUCE**

Pursuant to the Federal Rules of Civil Procedure, National Credit Systems, Inc., (hereinafter, the “Defendant”), hereby submits its responses to the Requests to Produce (“Requests”), propounded by ALYSSA PORTNOY & DARLENE PORTNOY (hereinafter, the “Plaintiffs”).

**GENERAL OBJECTIONS**

1. Defendant generally objects to all of Plaintiffs’ Requests to the extent that the Requests call for documents or documents protected by the attorney-client privilege, the attorney work product doctrine, and/or any other applicable privilege or protection. To the extent that a Request calls for privileged and /or protected documents or documents, Defendant objects and will not produce such documents or documents but will produce a privilege log.

2. To the extent that Defendant, pursuant to any Request propounded by Plaintiffs, produces a document which any party may later claim is privileged or which any party characterizes as privileged, it is understood that such production does not constitute a waiver of the applicable privilege or protection.